

United States Country Comments
Analysis of Environmental Risks
October 2002

Comment – In the Scope section, include the last paragraph under Purpose since this is really part of the Scope. Suggest the following changes:

“This supplement to ISPM Pub.No.11 provides details regarding the analysis of environmental risks of plant pests, including those affecting uncultivated/unmanaged plant species, wild, flora, habitats and ecosystems contained the Pest Risk Analysis (PRA) area. This supplement should only be used in conjunction with ISPM Pub. No. 11, since it is not a standalone document.

The processes this supplement describes are relevant to any PRA for quarantine pests. The supplement does not describe an independent PRA process. Relevant text, which further explains environmental risks, has been incorporated into the ISPM Pub. 11.

This supplement does not include consideration of vertebrates and species of marine environments. Biological control agents are separately covered under the International Plant Protection Convention (IPPC) by ISPM Pub. No.3 (*Code of conduct for the import and release of exotic biological control agents*). This supplement also does not consider genetically altered or modified organisms. Those organisms are dealt with in separate guidelines.

Comment – Under Purpose, second paragraph, the bullets are incorrect which makes the section nonsensical. The bulleted section should read as follows:

- Directly affect uncultivated/unmanaged plants
Introduction of these pests may have few commercial consequences, and they are less likely to be evaluated, and less likely to be regulated and /or placed under official control.

An example of this type of pest is *Ophiostoma novo ulmi* (Dutch elm disease).

- Indirectly affect plants
In addition to pests that directly affect host plants, there are those, like weeds/invasive plants, which affect plants primarily by other processes, such as competition.

An example is Yellow Star Thistle, *Centaurea solstitialis* L., in US rangelands. Other examples include Canada Thistle, *Cirsium arvense*; Puncturevine, *Tribulus terrestris*; and Purple loosestrife, *Lythrum salicaria*.

- Indirectly affects plants through effects on other organisms
Specific guidance is needed on pests that primarily affect other organisms, but thereby cause deleterious effects on plants or plant health in an ecosystem.

Examples are tracheal mites, *Acarapis woodi* and the Varroa mite, *Varroa jacobsoni*. These pests destroy bees and interfere with the pollination of plants.

Comment – Under Purpose, third paragraph, delete “can be protected”. This phrase is not necessary.

Comment – In Sec. 2.3.1, Pest effects, add the following paragraph, “The regulation of plants solely on the basis of their effects on human or animal health is outside the scope of this standard. Indirect effects must result as a consequence of direct effects on plants. However, the scope of domestic legal authority for national agencies which includes plant protection responsibilities may also include the authority to regulate on the basis of animal or public health protection. If the PRA process reveals evidence of a potential hazard to animal or public health this should be communicated to the agency which has the legal authority to deal with the issue.

Comment – In Sec. 2.3.2, analysis of economic consequences, the text needs to be consistent with the final of supplement No.2: Guidelines on the Interpretation and Application of Potential Economic Importance and Related Terms, which is currently being drafted. Also, this standard should be incorporated by reference.

Comment – Sec. 3, Pest Risk Management, change the last paragraph to read, “Pest Risk Management must be addressed despite lack of certainty in the assessments of economic consequences and probability of introduction.” This makes the sentence clearer.

Also, delete the second sentence referring to ‘Precautionary in nature’. The discussion of precautionary measures in the face of uncertainty is beyond the limited scope of this document and has broad implications. Recommend this issue be discussed in the broader context of ISPM No.1, Principles of Plant Quarantine as Related to International Trade, specifically in the context of Principle 12 – Managed Risk.